

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROLANDO MARTINEZ,

Defendant.

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CASE NO. 3:09-CR-0005

REQUEST FOR FULL DISCLOSURE OF EVIDENCE UNDER

RULE OF COMPLETENESS

COMES NOW, ROLANDO MARTINEZ, the defendant in the above-styled case and requests, pursuant to Fed.R.Evid. 106, that no fragmented portion, but the full length of the video-taped traffic stop in this case be shown to the jury and Court, to avoid misleading the trier of fact and insure a fair and impartial understanding of this case.

This case involves a video which reflects a lengthy search with special tools, a dog and a 52 minute search. It would be prejudicial to allow the government to show in part the opening of the trailer and the discovery of the drugs without showing the entire search from the purported consent of the accused to search the vehicle, to the time when the officer throws from the truck a box allegedly containing marijuana. Fifty-two minutes will hardly burden the Court or the jury when this defendant is facing a lengthy prison sentence and fundamental fairness demands that the jury feel the length of the search of the truck.

WHEREFORE, the Defendants prays that his Request be granted.

This 10th day of September, 2010.

Respectfully submitted,

/ss/

/ss/

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